

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Debtor.¹

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

**INFORMATIVE MOTION WITHDRAWING MOTION OF AMBAC ASSURANCE
CORPORATION, ASSURED GUARANTY CORP., ASSURED GUARANTY
MUNICIPAL CORP., AND FINANCIAL GUARANTY INSURANCE COMPANY
TO FILE DOCUMENTS RELATED TO
PRIFA LIFT STAY SUR-REPLY RESPONSE UNDER SEAL (ECF NO. 13216)**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Ambac², Assured, and FGIC, (collectively, “Movants”) by and through their undersigned attorneys, respectfully submit this informative motion (the “Motion”). Movants respectfully state as follows:

1. On May 26, 2020, Movants submitted a motion to seal certain papers related to the PRIFA lift stay motion (the “Motion to Seal”) (ECF No. 13216) in compliance with the requirement under the Protective Order to file any materials containing information designated as Confidential thereunder under seal. At the time the Motion to Seal was filed, Movants had requested that AAFAF agree to remove certain confidentiality designations, but had not yet received a response from AAFAF’s counsel.

2. The Court granted the Motion to Seal in its *Order Granting Motion to Seal for Limited Duration and for Supplemental Briefing*. (ECF No. 13221.)

3. This afternoon, before the PRIFA lift stay papers were filed, counsel for AAFAF consented to remove the confidentiality designations (subject to redactions of full account numbers and employee signatures). In light of AAFAF’s consent, Movants filed exhibits with the agreed-upon redactions on the public docket. In light of AAFAF’s consent, Movants did not make any sealed filing, and there is no need for AAFAF to make a submission on sealing requests.

4. Movants note that AAFAF’s request to seal aspects of the lift stay reply exhibits remains pending before the Court. (ECF No. 13173.) When the Court resolves AAFAF’s pending request with respect to the reply papers, Movants are prepared to re-file redacted versions of those papers on the public docket, consistent with the Court’s order on AAFAF sealing requests.

² Unless otherwise specified, defined terms have the meanings given to them in the *Stipulation and Protective Order* (ECF No. 12912) (the “Protective Order”) and Lift Stay Motions.

Dated: May 26, 2020
San Juan, Puerto Rico

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***Attorneys for Assured Guaranty Corp. and
Assured Guaranty Municipal Corp.***

CERTIFICATE OF SERVICE

I hereby certify that on this same date a true and exact copy of this notice was filed with the Clerk of Court using the CM/ECF system, which will notify a copy to counsel of record.

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